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November 11, 2024

Via ECF

Hon. Philip M. Halpern, U.S.D.J.
 The Hon. Charles L. Brieant Jr. Federal Building and Courthouse
 300 Quarropas St.
 White Plains, NY 10601-4150

Re: *Wolf, et al. v. Dolgen New York, LLC*
 Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

The Dann Law Firm and Milberg represent Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”) in the above referenced matter against Dolgen New York, LLC d/b/a Dolgen (“Dollar General”, the parties collectively, the “Parties”). In accordance with Section 1.C. of Your Honor’s Individual Practices, the Wolfs submit this letter-motion requesting an extension of the Wolfs’ deadline to respond to Dollar General’s Motion for Summary Judgment (the “Motion”), and in turn, Dollar General’s deadline to file its reply brief in further support of its Motion. Currently, the Wolfs’ deadline to serve their opposition to the Motion is November 15, 2024, and Dollar General’s deadline to serve its reply, and the Parties’ deadline to file its papers, is December 6, 2024. [August 29, 2024 Minute Entry].

In support of this request, the Wolfs advise that they have continued making progress on a possible resolution with Dollar General and hope to avoid incurring further fees and costs in pursuit of the same. To that end, the Wolfs seek the following extensions:

1. November 29, 2024: the Wolfs to serve their opposition; and
2. January 15, 2025: Dollar General’s deadline to file its reply and the Parties’ deadline to file all papers.

Dollar General consents to this request, and this is the Wolfs’ first request to extend the Motion deadlines.

Respectfully submitted,

The Dann Law Firm, PC

/s/ Javier L. Merino
 Javier L. Merino, Esq.
Counsel for Plaintiffs and the Putative Class

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Cc: All Counsel of Record (via ECF)